

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:	§	Chapter 11
FIELDWOOD ENERGY III LLC, et al.,	§	Case No. 20-33948 (MI)
Post-Effective Date Debtors.¹	§	(Jointly Administered)
	§	Re: ECF Nos. 2758, 2759 & 2763

**CERTIFICATE OF NO OBJECTION TO MOTION TO FURTHER EXTEND
THE DEADLINE TO FILE CLAIM OBJECTIONS TO SPECIFIED CLAIMS**

1. On June 25, 2021 the Court entered an order [ECF No. 1751] confirming the *Modified Eighth Amended Joint Chapter 11 Plan of Fieldwood Energy LLC and Its Affiliated Debtors* [ECF No. 1742] (including any exhibits and schedules thereto and as may be further amended, supplemented, or modified, including at ECF No. 2008, the “**Plan**”). Pursuant to Section 7.5 of the Plan, “[a]ny objections to a Claim shall be filed on or before the date that is the later of (a) 180 days after the Effective Date and (b) such later date as may be fixed by the Bankruptcy Court, after notice and a hearing, upon a motion by the Post-Effective Date Debtors, as such deadline may be extended from time to time.” On September 1, 2022, the Court entered an order

¹ The Post-Effective Date Debtors, along with the last four digits of each Post-Effective Date Debtor’s federal tax identification number, as applicable, are: Fieldwood Energy III LLC (6778); Fieldwood Energy Offshore LLC (4494), Fieldwood Energy Inc. (4991), GOM Shelf LLC (8107), and FW GOM Pipeline, Inc. (8440). Fieldwood Energy III LLC, Fieldwood Energy Offshore LLC, and Fieldwood Energy Inc. are managed and operated by the Plan Administrator, whose primary mailing address is 16255 Ventura Blvd., Suite 440, Encino, CA, 91436, C/O of Province LLC. GOM Shelf LLC and FW GOM Pipeline, Inc. (collectively, the “**Post-Effective Date FWE I Subsidiaries**”) are managed and operated by Jon Graham, as sole manager of each Post-Effective Date FWE I Subsidiary. The Debtors in the other nine pending chapter 11 cases (which continue to be jointly administered with the cases of the Post-Effective Date Debtors), each of which have either been dissolved or merged into other entities as of the Effective Date, consist of the following: Dynamic Offshore Resources NS, LLC (0158); Fieldwood Onshore LLC (3489); Fieldwood SD Offshore LLC (8786); Fieldwood Offshore LLC (2930); Bandon Oil and Gas GP, LLC (9172); Bandon Oil and Gas, LP (9266); Fieldwood Energy SP LLC (1971); Galveston Bay Pipeline LLC (5703); and Galveston Bay Processing LLC (0422).

extending the Claims Objection Deadline through February 18, 2023 with respect to certain claims identified on a schedule annexed to the order [ECF No. 2649] (the “**Prior Order**”).

2. On February 18, 2023, the Plan Administrator (the “**Plan Administrator**”), appointed pursuant to the Plan, filed the *Motion to Further Extend the Deadline to File Claim Objections to Specified Claims* [ECF No. 2758] (the “**Motion**”)² seeking a further extension of the Claims Objection Deadline through and including August 17, 2023 with respect to the Specified Claims, as well as the *Declaration of David M. Dunn in Support of Motion to Further Extend the Deadline to File Claim Objections to Specified Claims* [ECF No. 2759] (the “**Declaration**”). The Motion and Declaration were served on (i) holders of unresolved claims, including all holders identified on the Schedule of Specified Claims annexed to the Revised Proposed Order (each as defined below) (collectively, the “**Affected Claimants**”), via email on February 19, 2023 and/or via first class mail on February 21, 2023 and (ii) the Master Service List via email on February 19, 2023 and/or via first class mail on February 21, 2023 [ECF No. 2762]. Objections to the Motion were required to be filed and served by March 13, 2023 (the “**Objection Deadline**”).

3. On March 3, 2023, the Plan Administrator filed the *Notice of Filing of Schedule of Specified Claims in Connection with Motion to Further Extend Deadline to File Claim Objections to Specified Claims* [ECF No. 2763] (the “**Notice**”). Annexed to the Notice as Exhibit A was an unchanged version of the proposed order filed with the Motion, which included, as Schedule 1, the Schedule of Specified Claims³ (as defined in the Notice) (the “**Proposed Order**”).

² Capitalized terms used herein but not otherwise defined shall have the meanings ascribed to them in the Motion.

³ Each claim identified in the Schedule of Specified Claims was also identified in the schedule of claims annexed to the Prior Order except for four claims, one of which is a late filed claim and three others which purport to amend prior-filed claims.

The Notice and Proposed Order were served on the Affected Claimants and the Master Service List via email and/or first class mail on March 6, 2023 [ECF No. 2768].

4. Annexed hereto as **Exhibit A** is a revised Proposed Order (the “**Revised Proposed Order**”), which incorporates two changes. First, the Proposed Order was revised to clarify that the requested extension of the Claims Objection Deadline is only with respect to the Specified Claims identified on the Schedule of Specified Claims annexed to the Proposed Order. Second, the Schedule of Specified Claims was revised to remove Claim No. 779 filed by MultiKlient Invest AS because the claim had been previously withdrawn by the holder. A changed pages only redline of the Revised Proposed Order against the Proposed Order is annexed hereto as **Exhibit B**.

5. In accordance with paragraph 44 of the *Procedures for Complex Cases in the Southern District of Texas*, the undersigned counsel files this Certificate of No Objection and represents to the Court that (i) the Objection Deadline has passed, (ii) the undersigned counsel is unaware of any objection to the Motion, and (iii) the undersigned counsel has reviewed the Court’s docket and no objection or response to the Motion appears thereon.

6. Therefore, the Plan Administrator respectfully requests entry of the Revised Proposed Order.

Dated: March 15, 2023
Houston, Texas

Respectfully submitted,

/s/ Jessica Liou
WEIL, GOTSHAL & MANGES LLP
Alfredo R. Pérez (15776275)
Clifford W. Carlson (24090024)
700 Louisiana Street, Suite 1700
Houston, Texas 77002
Telephone: (713) 546-5000
Facsimile: (713) 224-9511
Email: Alfredo.Perez@weil.com
Clifford.Carlson@weil.com

-and-

WEIL, GOTSHAL & MANGES LLP
Matthew S. Barr (admitted *pro hac vice*)
Jessica Liou (admitted *pro hac vice*)
767 Fifth Avenue
New York, New York 10153
Telephone: (212) 310-8000
Facsimile: (212) 310-8007
Email: Matt.Barr@weil.com
Jessica.Liou@weil.com

*Attorneys for the Plan Administrator and
certain Post-Effective Date Debtors*

Certificate of Service

I hereby certify that on March 15, 2023, a true and correct copy of the foregoing document was served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Jessica Liou

Jessica Liou